This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

MI M Date 2/15/2005



1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthome, Governor Toni Hardesty, Director

November 8, 2004

Ms. Kathleen Hain, CERCLA Lead Environmental Restoration Program U.S. Department of Energy Idaho Operations Office 1955 Fremont Avenue Idaho Falls, Idaho 83401-1216

Re: Correction of previously signed Decision Statements for Track 1s

Dear Ms. Hain:

During a October 27, 2004 conference call, DOE identified several Track 1 decision statements that were signed by both EPA and DEQ over the last several months that differ in the nomenclature used to define the recommended status of the sites. Specifically, EPA recommended *No Action* at several sites while DEQ recommended *No Further Action* for these same sites. After further review of these documents, we have concluded that some of our previous recommendations were in error. This letter serves as official notice correcting these recommendations.

To clarify, DEQ recommends *No Action* for sites with no contamination source present, or for sites with a contamination source that currently poses an acceptable risk for unrestricted use. A *No Further Action* recommendation is made for sites with a contamination source or potential source present, but for which an exposure route is not available under current conditions. Although no additional remedial action is required at this time, current institutional controls (such as fencing and administrative controls that prevent or limit excavation/drilling into contaminated areas) must be maintained. After a remedial decision is made for these sites, they should be included in a CERCLA review performed at least every five years to ensure that site conditions used to evaluate the site have not changed and to evaluate the effectiveness of the *No Further Action* Decision. If site conditions or current institutional controls change, additional sampling, monitoring, or action will be considered.

On the basis of the above definitions, DEQ now recommends *No Action* under the FFA/CO for the following sites: Site-10, -17, -18, 21, -27, -28, -31, -32, -34, -37, -38, -40, -41, -42, -43, -44, and -47. However, note that Sites -18 and -38 are wells that must be secured and eventually closed and abandoned in accordance with Idaho Department of Water Resources regulations.

Ms. Kathleen Hain, Lead, CERCLA Program November 8, 2004 Page Two

DEQ continues to recommend *No Further Action* for Site-39. Although no live munitions have been identified at the site, the possibility exists for live munitions to be present mixed with the inert munitions that have been identified. Therefore, the site may pose an unacceptable risk to human health and the environment, if it were currently released for unrestricted use.

Please contact Margie English of my staff at (208) 373-0306 if you have questions about this letter.

) a

Sincerely

Daryl F. Koch FFA/CO Manager

DK/jc

CC:

Nicholas Ceto, U.S. EPA Region 10, Richland, WA Dennis Faulk, U.S. EPA Region 10, Richland, WA Kathy Ivy, U.S. EPA Region 10, Seattle, WA Mark Shaw, DOE, Idaho Falls Margie English, DEQ, Boise, ID SITE 042 TRACK 1 DECISION DOCUMENTATION PACKAGE, OU 10-08

DECISION DOCUMENTATION PACKAGE COVER SHEET

Prepared in accordance with

TRACK 1 SITES: GUIDANCE FOR ASSESSING LOW PROBABILITY HAZARD SITES AT THE INEEL

Site Description:

Construction Debris Northeast of EOCR

Site ID:

042

Operable Unit:

10-08

Waste Area Group:

10

I. Summary – Physical Description of the Site:

Site 042 consists of construction debris located just north of the Experimental Organic Cooled Reactor (EOCR)/ Security Training Facility (STF). This site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, "Reporting or Disturbance of Suspected Inactive Waste Sites," a new site identification form was completed for this site. As part of the process, a field team wrote a site description, collected photographs and global positioning system (GPS) coordinates of the site. The coordinates for the two major debris areas are

. The GPS coordinate system is listed as North

American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

Investigations revealed that Site 042 covers an area ~250 ft in diameter containing scattered construction debris including a pile of broken sewer pipes, broken cinder blocks and concrete, weathered plywood, a rusted empty 55-gallon drum (no residue), pieces of reinforced concrete, stovepipe, rebar, and cable. A small trash pile partially covered with dirt contains weathered wood, metal, rubber, hose, cable, and wire. The scattered debris appears to be industrial in nature. The waste was likely discarded during construction of the EOCR facility in 1959-1962. The EOCR facility never became operational. The project was over 90% complete in 1962 when it was cancelled and the facility was abandoned. The EOCR building later served as the training facility for the INEEL Security Special Response Team from 1983-1990.

There is no visual evidence of hazardous constituents or evidence that waste has recently been disposed of at this site. There is no evidence of stained or discolored soil, or odors. The ground surface shows well established vegetation with healthy native grasses and sagebrush. The description of the site conditions is based on recent site investigations; no field screening or sample data exist for this site.

DECISION RECOMMENDATION

II. SUMMARY – Qualitative Assessment of Risk:

There is no evidence that a source of contamination exists or empirical, circumstantial, or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with INEEL personnel, and photographs revealed no visual evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 042 is considered low.

III. SUMMARY – Consequences of Error:

False Negative Error:

The possibility that contaminant levels are above risk-based limits is remote. Field investigations of the debris and surface soil showed no evidence of hazard constituents, stained soil, odors, fibrous materials, or other indications that contamination might be present.

False Positive Error:

If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides and other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

IV. SUMMARY – Other Decision Drivers:

There are no other decision drivers for this site.

Recommended Action:

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews with personnel having knowledge of this area, and photographs indicate it is unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located in a remote area with no viable pathways or receptors. Central Facilities Area (CFA) is the closest operating INEEL facility and is located approximately 2 miles west. Nothing at this site shows evidence of contaminant migration or historical or threatened release of hazardous substances, pollutants or contaminants. The EOCR Facility was abandoned in 1963 and was never operational. The debris appears to be old, weathered, and likely dates to that time. No other INEEL site of this type has been shown to present a risk to human health or the environment.

Signatures: world bless		# Pages:	16	Date:	8/23/01
Prepared By: Marilyn Paarmann DOE W		AG Manage	r:		
Approved By: Mines Thouse 9-30-0	Indeper	ndent Revie	whit	t C. Ro	no 9-28-04

DECISION STATEMENT
(DOE RPM)

Date Received: //14/05

Disposition:

The construction debris at site OYZ north of

5TF 13 classified as no action. This determination
will be recorded in the new site database and

listed in the INEEL 2005 Integrated 5-Your

Review

Date: 1/14/05 # Pages: 16

Name: Kuthleen Huin Signature: Unthleen 5 Hair

DECISION STATEMENT
(EPA RPM)

5,te-042

Date Received:

Disposition:

EPA concurs that this site should be classified as

Date: 9-23-01

Pages: 16

Signature

DECISION	STAT	TEMENT
(IDE	Q RP	M)

Date Received:

May 8, 2002

Disposition:

Site 042

Site 042 is construction debris located just north of EOCR/STF. The debris covers an area about 250 feet in diameter and includes broken sewer pipe, broken cinder blocks and concrete, weathered plywood, a rusted empty 55 gallon drum, pieces of reinforced concrete, stovepipe, rebar, and cable. A small, partially covered trash pile contains weathered wood, metal, rubber hose, cable, and wire. The debris appears to be industrial in nature and was probably discarded during construction of EOCR in 1959-1962. Construction of EOCR stopped in 1962 at 90% complete and was abandoned at that time. There is no visual evidence that hazardous constituents were disposed at the site but no field screening or sample data exist. There is no evidence of stained soils or odors and vegetation is well established.

The State recommends this site for No Further Action.

Name: Paye F. Koch Signature: Lang J. Josh

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PROCESS/WASTE WORKSHEET	VORKSHEET	
SITE ID : 042	PROCESS:	Construction Debris Northeast of EOCR
	WASTE:	Construction Debris
Col 1 Processes Associated with this Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Debris likely abandoned from EOCR construction activities.	Construction pit used during EOCR construction (1959-62 timeframe).	Artifact: Industrial Debris Location: This site is located 1/4 mile north of EOCR/STF.
		Broken sewer pipes, broken cinder blocks, a rusted empty 55-gallon drum (no residue), weathered plywood, reinforced concrete, stovepipe, rebar, and cable. An area where it appears dirt has been pushed over a trash pile - items in this pile include wood, metal, rubber, hose, cable, and wire.

CONTAMINANT WORKSHEET					
SITE ID: 042	PROCESS:	Construction Debris Northeast of EOCR	ortheast of EOCR		
	WASTE:	Construction Debris			
Col 4 What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	Col 5 Potential Sources Associated with this Hazardous Material	Col 6 Known/Estimated Concentration of Hazardous Substances/ Constituents	Col 7 Risk-based Concentration	Col 8 Qualitative Risk Assessment (high/med/	Col 9 Overall Reliability (high/med/ low)
None	Soil	None	Not Applicable	Low	High

Question 1.	What are the waste generation processes, locations, and dates of operation associated with this site?		
Block 1	Answer:		
Site 042 contains construction debris including a pile of broken sewer pipes, broken cinder blocks, a rusty 55-gallon drum (no residue present), weathered wood, reinforced concrete, stovepipe, rebar, and cable. Located just northwest is a small trash pile of scattered debris including; wood, metal, rubber, hose, cable, and wire. The waste was likely discarded during construction of the EOCR facility in 1959-1962. The EOCR facility never became operational and the facility was abandoned in 1963. The EOCR building later served as the training facility for the INEEL Security Special Response Team from 1983-1990.			
Block 2	How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)		
	h Environmental Restoration (ER) personnel revealed that the site was likely a bit from the EOCR facility. Materials found at the site are industrial in nature and pose		
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)		
Interviews, site investigations, and photographs reveal the history of the site and present condition.			
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)		
	2,5 Documentation about Data Disposal Data DA Data S Safety Analysis Report Surrence Report Data Data		

Question 2.	What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?
Block 1	Answer:
EOCR facility EOCR, and a	realed that Site 042 is an old construction pit likely containing debris from the former. The site is located within the boundaries of the INEEL, one-quarter mile north of opproximately 2 miles from CFA, the nearest operating INEEL facility. Site indicate that the abandoned debris is weathered and is likely 40-50 years old.
Block 2	How reliable are the information sources? ☑ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
construction p	h INEEL personnel and site investigations revealed that this site was an abandoned bit that likely resulted during construction of the EOCR facility. Historical records timeframe of the EOCR operation. Photographs provide a description of the debris and onditions.
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)
This informati research.	on was confirmed with interviews, site investigations, photographs, and historical
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2,5 Documentation about Data Disposal Data DA Data S Safety Analysis Report Currence Report Disposal Data

Question 3.	Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.	
Block 1	Answer:	
constituents,	vidence that a source exists at Site 042. There is no evidence of hazardous stained or discolored soil, or odors. The debris was identified to have likely resulted onstruction during the 1959-62 timeframe.	
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
	te investigations, photographs, and historical research of the area suggest that this is uction pit. The debris is industrial in nature, and poses no likely risk to human health or ent.	
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)	
Interviews, site investigations, photographs, and historical research confirm the information.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
Anecdotal Historical Procurrent Proc Photographs Engineering	cess Data QA Data QA Data S	

Question 4.	Is there empirical, circumstantial, or other evidence of migration? If so, what is it?
Block 1	Answer:
hazardous co debris is old a blocks, a ruste and cable. Th	vidence of migration at Site 042. Site investigations reveal no visual evidence of instituents, disturbed, stained or discolored soil areas, or odors. The construction and weathered and includes a pile of broken sewer pipes, plywood, broken cinder and empty 55-gallon drum (no residue), pieces of reinforced concrete, stovepipe, rebar, a small trash pile located just northwest includes wood, metal, rubber, hose, cable, re is no evidence that any type of hazardous materials were abandoned at the site.
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)
	ns indicate that debris consists of old construction materials. Photographs reveal the s and present site conditions.
Block 3	Has this INFORMATION been confirmed? ☐ Yes ☐ No If so, describe the confirmation. (check one)
This informati photographs.	on was confirmed through site inspections, historical research, interviews, and
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)
	2,5 Documentation about Data Disposal Data QA Data QA Data Site Drawings Urrence Report Urrence Report Urrence Report Well Data

Question 5.	Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?	
Block 1	Answer:	
materials at the of stained or continuous, his	spected pattern of potential contamination because there is no evidence of hazardous ne site. The debris is scattered over an approximate 250 ft area. There is no evidence discolored soil in the area, odors or visual evidence of disturbed vegetation. Based on storical research of the EOCR/STF area, and site investigations, there is no reason to rdous constituents are present at this site.	
Block 2	How reliable are the information sources? ⊠ High ☐ Med ☐ Low Explain the reasoning behind this evaluation. (check one)	
	on was obtained from a 1994 environmental baseline assessment, subsequent site interviews with INEEL personnel, and photographs taken during the investigation.	
Block 3	Has this INFORMATION been confirmed? ⊠ Yes ☐ No If so, describe the confirmation. (check one)	
This information was confirmed through site inspections, interviews, photographs and historical research.		
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)	
	2,5 Documentation about Data Disposal Data Disposal Data DA DA	

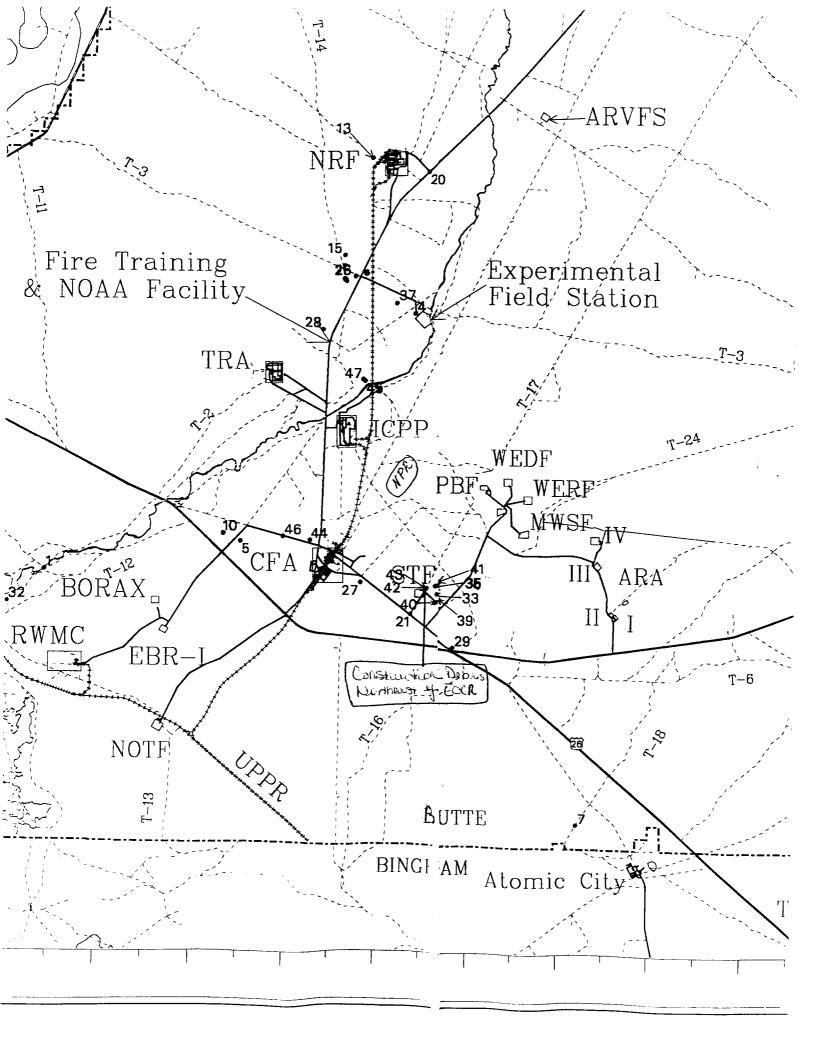
Question 6.	Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.			
Block 1	Answer:			
There is no evidence that a source exists at this site. Investigations and photographs indicate that old, weathered construction debris is scattered over a ~250 ft area. The debris likely resulted from the construction of the EOCR facility and was discarded when the operation was shut down in 1961. The facility was never completed or became operational. Nothing appears to indicate that the construction debris contains hazardous constituents that would pose a risk to human health or the environment.				
Block 2 How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)				
This information was obtained from an environmental baseline assessment conducted in 1994, a subsequent site investigation, and interviews. Photographs taken during the investigation show well established vegetation, and no evidence of stained or discolored soil indicating the presence of hazardous constituents.				
Block 3	lock 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)			
This information was confirmed through site inspections, interviews, photographs and historical research.				
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)				
	2,5 Documentation about Data Disposal Data Disposal Data DA DA Data DA			

Question 7.	What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.			
Block 1	Answer:			
The estimated quantity of hazardous substances/constituents at this site is near zero because there is no evidence of hazardous materials. The site consists of industrial debris likely resulting from construction of the former EOCR facility. Scattered debris includes broken sewer pipes, broken cinder blocks, a rusted empty 55-gallon drum (no residue present), weathered wood, pieces of reinforced concrete, stovepipe, rebar, and cable. The small trash pile consists of wood, metal, rubber, hose, cable, and wire. There is no evidence that hazardous substances are present at this site.				
Block 2 How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)				
This information was obtained from an environmental baseline assessment, subsequent site investigation, interviews, and photographs of the area. None revealed visual evidence of hazardous constituents.				
Block 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)				
This information was confirmed through site inspections, interviews, photographs and historical research.				
Block 4	Sources of Information (check appropriate box(es) & source number from reference list)			
	2,5 Documentation about Data Disposal Data Cess Data QA Data S Safety Analysis Report Cite Drawings Unitial Assessment Value Data Well Data			

Question 8.	Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.			
Block 1	Answer:			
There is no evidence that a hazardous substance or constituent is present at levels that require action at this site. Investigations revealed that Site 042 covers a ~250 ft area containing scattered construction debris. There is no visual evidence of hazardous constituents or evidence that waste has recently been disposed of at this site. There is no evidence of stained or discolored soil, or odors. The ground surface shows well established vegetation with healthy native grasses and sagebrush.				
Block 2 How reliable are the information sources? High Med Low Explain the reasoning behind this evaluation. (check one)				
This evaluation is based on interviews, site visitations and photographs of the area. The site shows no soil staining or discoloration, or odors.				
Block 3	ck 3 Has this INFORMATION been confirmed? Yes No If so, describe the confirmation. (check one)			
This information was confirmed through site inspections, interviews and photographs.				
Block 4 Sources of Information (check appropriate box(es) & source number from reference list)				
	2,5 Documentation about Data Disposal Data Disposal Data DA DA			

REFERENCES

- 1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID-10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
- 2. Interview with an Environmental Baseline Assessment team member, February 6, 2001.
- 3. Photographs of Site 042: PN99-0494-1-8, PN99-0494-1-9.
- 4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
- 5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management, February 7 and May 16, 2001.



DRAFT DRAFT

Attachment A

Photographs of Site #042



Site: 042 Construction Debris Northeast of EOCR/STF PN99-0494-1-8



Site: 042 Construction Debris Northeast of EOCR/STF PN99-0494-1-9

Attachment B

Supporting Information for Site #042

NEW SITE IDENTIFICATION

Pa	rt A - To Be Completed By Observer					
1.	Person Initiating Report: Jacob Harris	Phone: 526-1877				
	Contractor WAG Manager: Douglas Burns	Phone: 526-4324				
2.	Site Title: 042, Construction Debris Northeast of EOCR					
3.	Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.					
	The area north of EOCR/STF has several areas of construction debris. During to included a pile of broken sewer pipe, a pile of broken cinder block, a rusty 55 gas cable, re-bar, etc. Also, northwest of EOCR is an area where it appears dirt has pile are wood, metal, rubber, hose, cable, wire, etc. The GPS coordinates of the trash pile partially covered with dirt at number for this site is 042 and can be found on the summary map as provided.	Illon drum, pieces of reinforced concrete, stovepipe, been pushed over a trash pile. Some items in this pile of broken sewer pipe are				
Pa	Part B – To Be Completed By Contractor WAG Manager					
4.						
	This site meets the requirements for an inactive waste site, requires investigned FFA/CO Action Plan. Proposed Operable Unit assignment is recommended WAG: Operable U	d to be included in the FFA/CO.				
	This site DOES NOT meet the requirements for an inactive waste site, DOE included in the INEEL FFA/CO Action Plan.	ES NOT require investigation and SHOULD NOT be				
5.	Basis for the recommendation:					
	The conditions that exist at this site indicate the potential for an inactive waste s or Disturbance of Suspected Inactive Waste Sites.	ite according to Section 2 of MCP-3448 Reporting				
i						
	The basis for recommendation must include: (1) source description; (2) exposurements and (4) descriptions of interfaces with other programs, as applicable (exposurements).	are pathways; (3) potential contaminants of e.g., D&D, Facility Operations, etc.)				
6.	Contractor WAG Manager Certification: I have examined the proposed site and believe the information to be true, accurate, and complete. My recommendation	the information submitted in this document and is indicated in Section 4 above.				
Name: Signature:		Date:				



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DATE:

PROJECT DOCUMENT REVIEW RECORD

Comment incorporated. However, the text has been changed to state CFA is west of the site. "northeast" in the title was stipulated by the cannot be changed. The site is north of the former EOCR and east of CFA and this has Comment incorporated. However, the term new site identification form author and it Site 042 Track 1 Decision Documentation Package, OU 10-08: Construction Debris Northeast of EOCR RESOLUTION been clarified in the main text. Page 2 - Block IV incorrectly states that the CFA is southwest of the site. CFA is northwest of the site. Please correct. These pages use north, northeast, and northwest in various contexts Please clarify the directions used to tell the location of the site. IDEO which is confusing. (DOE/ID 10950) REVIEWER: Page 2 Block IV NUMBER Pages 1, 9, DOCUMENT TITLE/DESCRIPTION: and last SECTION NUMBER April 3, 2002 COMMENTS NUMBER

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